

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN THE MATTER OF )  
 ) Chapter 13  
LaRon L. Gibson ) No. 18-23571  
 ) Judge LaShonda A. Hunt  
Debtor(s) ) Trustee: Marilyn O. Marshall

NOTICE OF MOTION

Please take notice that on May 20, 2019 at 9:30am or as soon thereafter as counsel may be heard, I shall appear before her Honor, Judge LaShonda A. Hunt in Courtroom 719 in the United States Courthouse, 219 S. Dearborn, Chicago, Illinois, or before any other Judge who may be presiding in her place and stead, and shall then and there present the motion of Raffy A. Kaplan to present a Motion to Modify the Confirmed Plan at which time and place you may appear if you so desire.

Dated: April 29, 2019

/s/ Raffy A. Kaplan  
Raffy A. Kaplan  
Attorney for Debtor

Raffy A. Kaplan  
Kaplan Bankruptcy Firm, LLC  
25 East Washington St. Suite 1501  
Chicago, IL 60602  
ARDC 6275234  
(312) 294-8989

PROOF OF SERVICE

I, Raffy A. Kaplan, an attorney, certify that a copy of this Notice and Motion were served upon the parties listed in the attached service list including debtor(s), trustee and all creditors by causing same to be mailed in a properly addressed envelope, postage prepaid from the U.S. Postal Office Box at 25 East Washington St. Chicago, IL 60602 before 5:00 pm on April 29, 2019 unless a copy was provided electronically by the Bankruptcy Court.

/s/Raffy A. Kaplan  
Raffy A. Kaplan

LaRon L. Gibson  
1150 West 18th Street IL  
Broadview, IL 60155

Marilyn O. Marshall (via electronic notice)  
224 S. Michigan Ave., Ste. 800  
Chicago, IL 60604

Office of The U.S. Trustee (via electronic notice)  
219 S. Dearborn, Street, Ste. 873  
Chicago, IL 60604

AT&T  
c/o Diversified Consultants  
P.O. Box 551268  
Jacksonville, FL 32255

Bank of America Checking Account  
P.O. Box 25118  
Tampa, FL 33622-5118

Check n Go  
1047 South York  
Unit C  
Bensenville, IL 60106

Child Support Division  
28 N Clark  
Room 200  
Chicago, IL 60602

City of Chicago Dept. of Revenue\*  
Bankruptcy Department  
121 N. LaSalle, Rm 107A  
Chicago, IL 60604

City of Chicago Dept. of Revenue\*  
c/o Arnold Scott Harris PC  
222 Merchandise Mart Pz, #1932  
Chicago, IL 60654

City of Chicago Dept. of Revenue\*  
c/o Linebarger Goggan Blair & Samps  
P.O. Box 06152  
Chicago, IL 60606-0152

Comcast  
c/o Diversified Consultants

D. Patrick Mullarkey  
Tax Division (DOJ)  
P.O. Box 55, Ben Franklin Station  
Washington, DC 20044

DMV  
17 N. State St.  
10th Floor  
Chicago, IL 60602

ERC  
P.O. Box 23870  
Jacksonville, FL 32241-3870

Harris & Harris\*  
111 W. Jackson Blvd, Ste. 400  
Chicago, IL 60604

Illinois Department of Revenue  
P.O. Box 19006  
Springfield, IL 62794-9006

Illinois Department of Revenue\*  
Bankruptcy Section  
P.O. Box 64338  
Chicago, IL 60664-0338

Illinois Dept. of Health and Family  
Child Support Division  
P.O. Box 19152  
Springfield, IL 62794-9152

Illinois Dept. of Healthcare & Fami  
2200 Churchill Rd.  
Bldg. A, Floor 2  
Springfield, IL 62702

Illinois Dept. of Healthcare & Fami  
401 S. Clinton  
5th Floor  
Chicago, IL 60607

Illinois Dept. of Healthcare & Fami  
509 S. Sixth St.  
Springfield, IL 62701

Illinois Dept. of Healthcare/Family

Divison of Child Support  
32 . Randolph, 10th Floor  
Chicago, IL 60601

Internal Revenue Service  
575 N. Pennsylvania Street  
M/S SB380  
Indianapolis, IN 46204

Internal Revenue Service  
2970 Market Street  
Mail Stop 5-Q30.133  
Philadelphia, PA 19104-5016

Internal Revenue Service  
230 S. Dearborn, MS 4401  
Attn: D.R. Calhoun-1248182  
Chicago, IL 60604

Internal Revenue Service  
P.O. Box 7317  
Philadelphia, PA 19101-7317

Internal Revenue Service\*  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Linebarger, Goggan Blair & Sampson  
233 S Wacker Dr # 4030  
Chicago, IL 60606

Payday Loan Store  
PLS Financial Bankruptcy Dept.  
1020 N. McLean Blvd.  
Elgin, IL 60123

PCC Community Wellness Center  
Attn: 17468C  
P.O. Box 14000  
Belfast, ME 04915-4033

Peoples Gas\*  
Attn: Bankruptcy/Legal Department  
200 E. Randolph Street, Floor 20  
Chicago, IL 60601

Quest Diagnostics  
P.O. Box 740397  
Cincinnati, OH 45274-0397

Secretary of State  
2701 S. Dirksen Parkway  
Springfield, IL 62723

TitleMax of Illinois d/b/a TitleMax  
398 Mannheim Road  
Bellwood, IL 60104

Village of Oak Park  
Parking Permits & Tickets Office  
123 Madison Street  
Oak Park, IL 60302

Village of Oak Park  
P.O. Box 4563  
Carol Stream, IL 60197-4563

West Suburban Medical Center  
c/o CMRE Financial Services  
3075 E. Imperial Hwy., Ste. 200  
Brea, CA 92821-6753

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS,  
EASTERN DIVISION

IN THE MATTER OF

LaRon L. Gibson

Debtor(s)

)  
) Chapter 13  
) No. 18-23571  
) Judge LaShonda A. Hunt  
) Trustee: Marilyn O. Marshall

MOTION TO MODIFY THE CONFIRMED PLAN

Now comes the debtor's attorney, Raffy A. Kaplan and moves this court to modify the confirmed plan and in support of this motion states as follows:

1. On August 21, 2018 the debtor(s) filed a petition for relief pursuant to Chapter 13 of Title 11 U.S.C.
2. On January 28, 2019, debtor's case was confirmed at the rate of \$230.00 per month for 45 months paying 100% to allowed secured and 10% to unsecured creditors; the plan presently stands at 70.28% to unsecured creditors.
3. In January 2019, the debtor fell upon a brief period of unemployment, he was let go due to cutbacks; this caused the debtor default under the chapter 13 plan;
4. The debtor has procured employment through Accurate Personal and has consented to payroll.
5. Pursuant to §1329 of the U.S. Bankruptcy Code, the court may modify the plan upon request of the debtor.
6. Under the new proposal, the debtor will pay the Trustee the same plan payment but will defer the default to the end of the plan term.
7. Based on the claims filed in this case, unsecured creditors will continue to receive 70.28% of their allowed claims.
8. The modified plan complies with the requirements of §1322 and §1325 of the U.S. Bankruptcy Code.

Wherefore, the debtor prays that this Honorable Court will authorize modification of debtor's plan deferring any default through April 21, 2019 providing for monthly payments to the Trustee of \$230.00 for the remaining months of the plan, and any other relief that this Court deems just and proper under the circumstances.

Dated: April 29, 2019

Respectfully Submitted,

/s/ Raffy A. Kaplan  
Attorney for Debtor

Raffy A. Kaplan  
Kaplan Bankruptcy Firm, LLC  
25 East Washington St. Suite 1501  
Chicago, IL 60602  
ARDC 6275234  
(312) 294-8989